

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

TRAVIS L. REVELS,

Plaintiff,

Case No. 11-cv-435

vs.

Lincoln County Case No.: 11-CV-169

CHIQUEOINE & MOLBERG, S.C. and
STEPHEN D. CHIQUEOINE,

Defendants.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that defendants, Chiquoine & Molberg, S.C. and Stephen D. Chiquoine (collectively “Chiquoine”) hereby remove this action to the United States District Court for the Western District of Wisconsin, pursuant to 28 U.S.C. §§ 1331 (federal question), 1441 and 1446, and as and for their short, plain statement of the grounds for removal, respectfully state and allege as follows:

1. On May 6, 2011, the plaintiff, Travis Revels (“Revels”), commenced an action against defendants, Chiquoine, in the Circuit Court for the State of Wisconsin – Lincoln County captioned *Revels v. Chiquoine & Molberg, S.C., et al*, Case No. 11-CV-169, by filing of a Summons and Complaint with the Lincoln County Clerk of Courts, a true and correct copy of which is attached hereto as **Exhibit 1**.

2. The defendants first received Exhibit 1 within the meaning of 14 U.S.C. § 1446(b) on May 22, 2011. The time within which the defendants are required to file a responsive pleading has not yet expired, the parties having agreed to an extension of the deadline for filing

responsive pleadings to June 30, 2011, **Exhibit 2**. No further proceedings have been had in this action.

3. The complaint filed by Revels, Exhibit 1, is a civil action of which this court has original jurisdiction pursuant to 28 U.S.C. § 1331 (federal question), in that it sets forth a claim for alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq (“FDCPA”). Exhibit 1.

4. Removal is timely under 28 U.S.C. § 1446(b) as defendants first received the Summons and Complaint, Exhibit 1, on May 22, 2011.

5. In accordance with 28 U.S.C. § 1446(d), written notice of removal is being provided to the plaintiffs and filed with the Clerk of the Circuit Court for Lincoln County

Dated this 17th day of June, 2011.

/s/ David J. Hanus

David J. Hanus

State Bar No. 1027901

Brett B. Larsen

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